

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

ERIC L. JEFFRIES,

Plaintiff,

VS.

CENTRE LIFE INSURANCE COMPANY,  
et al.,

Defendants.

Case No. C-1-02-351

(Judge Beckwith)  
(Magistrate Judge Hogan)

**NOTICE OF FILING AFFIDAVIT**  
**OF PETER CINQ MARS**

Now comes Defendant Centre Life Insurance Company and gives notice of filing the Affidavit of Peter Cinq Mars. In preparation of the Court's anticipated ruling regarding electronic information, Mr. Cinq Mars was asked to conduct an analysis of the cost required to retrieve information from remotely stored back-up tapes. Mr. Cinq Mars' calculations are outlined therein.

It is estimated that it will cost in excess of \$50,000.00 to access the information requested by Plaintiff. Defendant is prepared to begin the requested retrieval upon receipt of Plaintiff's counsel's firm check or the posting a bond in the amount of \$50,000.00 payable within 30 days of the retrieval completion.

Respectfully submitted,

s/Peter M. Burrell

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Massachusetts Casualty Insurance Company  
and Disability Management Services, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been filed with the Court by electronic means on this 6<sup>th</sup> day of October 2003 and by regular U.S. Mail. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and by regular U.S. Mail. Parties may access this filing through the Court's system.

s/Peter M. Burrell  
Peter M. Burrell, Esq.

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